

Objection Deadline: July 5, 2023

James I. Stang (admitted *pro hac vice*)
John W. Lucas
Gillian N. Brown
PACHULSKI STANG ZIEHL & JONES LLP
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Counsel to the Official Committee of Unsecured Creditors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:
In re	: Chapter 11
	:
MADISON SQUARE BOYS & GIRLS CLUB, INC., ¹	: Case No. 22-10910-SHL
	:
Debtor.	:
	:
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**ELEVENTH MONTHLY FEE STATEMENT OF
PACHULSKI STANG ZIEHL & JONES LLP FOR
COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS COUNSEL
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR THE PERIOD FROM MAY 1, 2023 THROUGH MAY 31, 2023**

¹The last four digits of the Debtor's federal tax identification number are 6792. The Debtor's mailing address is 250 Bradhurst Avenue, New York, New York 10039.

Name of Applicant:	Pachulski Stang Ziehl & Jones LLP
Authorized to Provide Professional Services to:	Official Committee of Unsecured Creditors
Date of Retention:	July 16, 2022
Period for which compensation and reimbursement is sought:	May 1, 2023 through May 31, 2023
Monthly Fees Incurred:	\$66,346.50
Fee Reduction:	(\$15,916.50) ²
Fees (After Reduction):	\$50,430.00
20% Holdback:	\$10,086.00
Total Fees Less 20% Holdback:	\$40,344.00
Monthly Expenses Incurred:	\$573.28
Total Fees and Expenses Due:	\$40,917.28
This is a <u> X </u> monthly <u> </u> interim <u> </u> final application	

Pursuant to sections 327, 330, and 331 of chapter 11 of title 11 of the United States Code, Rule 2016 of the Federal Rules of Bankruptcy Procedure, Rule 2016-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York, the *Order Authorizing and Approving the Employment of Pachulski Stang Ziehl & Jones LLP as Counsel to the Official Committee of Unsecured Creditors Effective as of July 16, 2022* [Docket No. 196]

² As disclosed in the Firm's employment application, the Firm is utilizing rates that are reduced from standard rates so that attorney time is capped at \$900 per hour and paralegal time is capped at \$400 per hour. The reduction set forth in this Fee Statement here accounts for the reduction from the following standard rates, as set forth in Exhibit A hereto: J. Stang (\$1,695); M. Pagay (\$1,295); J. Lucas (\$1,150); G. Brown (\$975); B. Dassa (\$545); and Y. Derac (\$545).

(the “PSZJ Retention Order”), and the *Order Establishing Procedures for Monthly Compensation and Reimbursement of Expenses of Professionals* [Docket No. 125] (the “Interim Compensation Order”),³ Pachulski Stang Ziehl & Jones LLP (“PSZJ”), counsel for the Official Committee of Unsecured Creditors (the “Committee”), hereby submits this monthly fee statement (the “Fee Statement”), seeking compensation for services rendered and reimbursement of expenses incurred as counsel to the Committee in this chapter 11 case (the “Case”) during the period May 1, 2023 to May 31, 2023 (the “Fee Period”).

By this Fee Statement, PSZJ seeks payment in the amount of \$40,917.28, comprised of the following: (i) \$40,344.00, which is eighty percent (80%) of the total amount of fees incurred for actual and necessary services rendered during the Fee Period, and (ii) reimbursement of \$573.28, which is one hundred percent (100%) of actual and necessary expenses that PSZJ incurred in connection with its representation of the Committee during the Fee Period.

Services Rendered and Expenses Incurred

1. Attached as **Exhibit A** is a summary of PSZJ’s professionals by individual, setting forth the (i) name and title of each individual who provided services in connection with this chapter 11 case during the Fee Period, (ii) the year of bar admission for each PSZJ attorney, (iii) the current, standard hourly billing rate for each individual at PSZJ working on this chapter 11 case during the Fee Period, (iv) the capped hourly rate for those individuals, and (v) the total fees that each individual billed to this Case during the Fee Period at the applicable capped billing rate. The Committee hired PSZJ on the condition that the total fees incurred would be discounted to the extent the blended rate of PSZJ attorneys does not exceed \$900.00 per hour. All of the PSZJ attorneys who worked on this Case during the Fee Period have standard billing rates in

³ Capitalized terms used herein but not otherwise defined herein have the meanings ascribed to them in the Interim Compensation Order.

excess of \$900.00 per hour. As provided in the PSZJ Retention Order, PSZJ paralegal hourly rates on this Case will not exceed \$400.00 per hour. All of the PSZJ paralegals who worked on this Case during the Fee Period have standard billing rates in excess of \$400.00 per hour. PSZJ is providing a reduction in attorney and paralegal fees for the Fee Period in the amount of \$15,916.50.

2. Attached as **Exhibit B** is a summary of the services PSZJ rendered during the Fee Period and the compensation it seeks, by project category.

3. Attached as **Exhibit C** is a summary of expenses that PSZJ incurred during the Fee Period and for which it seeks reimbursement.

4. Attached as **Exhibit D** is itemized time detail of PSZJ professionals during the Fee Period and summary materials related thereto.

Notice and Objection Procedures

5. Notice of this Fee Statement shall be given by U.S. Mail, or by email where available, upon (a) the Debtor, Madison Square Boys and Girls Club, Inc., 250 Bradhurst Avenue, New York, New York 10039 (Attn.: Mr. Tim McChristian); (b) Debtor's counsel: Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, New York 10019 (Attn.: Alan W. Kornberg, Esq.; Andrew M. Parlen, Esq.; John T. Weber, Esq.; and Shafaq Hasan, Esq.); and (c) William K. Harrington, United States Trustee for Region 2, U.S. Department of Justice, Office of the U.S. Trustee, 201 Varick Street, Room 1006, New York, New York 10014 (Attn.: Andrea B. Schwartz, Esq. and Tara Tiantian, Esq.) (the "**Notice Parties**").

6. Objections to this Fee Statement, if any, must be filed with the Court and served upon PSZJ and the other Notice Parties (set forth at para. 5, above) so as to be received no later

than **July 5, 2023** (the “Objection Deadline”), setting forth the nature of the objection and the amount of fees or expenses at issue (an “Objection”).

7. If no Objections to this Fee Statement are filed and served as set forth above, the Debtor shall promptly pay eighty percent (80%) of the fees and one hundred percent (100%) of the expenses set forth in this Fee Statement.

8. If an Objection to this Fee Statement is received on or before the Objection Deadline, the Debtor shall withhold payment of that portion of this Fee Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. *See* Interim Compensation Order. To the extent such an Objection is not resolved between PSZJ and the party filing the Objection, the Objection shall be preserved and scheduled for consideration at the next interim fee application hearing.

Dated: June 19, 2023

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Gillian N. Brown

James I. Stang (admitted *pro hac vice*)

John W. Lucas

Gillian N. Brown

780 Third Avenue, 34th Floor

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*Counsel to the Official Committee of Unsecured
Creditors*

EXHIBIT A

Compensation by Professional

**SUMMARY OF COMPENSATION BY PROFESSIONAL
FOR SERVICES RENDERED FOR THE PERIOD
APRIL 1, 2023 – APRIL 30, 2023**

Name of Professional Partners and Counsel	Title	Year Admitted	Standard Hourly Rate (\$)	Capped Hourly Rate in this Case (\$)	Total Billed Hours	Total Compensation at Capped Rate (\$)
James I. Stang	Partner	1980	1,695.00	900.00	2.10	1,890.00
Malhar S. Pagay	Partner	1997	1,295.00	900.00	8.70	7,830.00
John W. Lucas	Partner	2005	1,150.00	900.00	39.90	35,910.00
Gillian N. Brown	Counsel	1999	975.00	900.00	3.60	3,240.00
Total Partners and Counsel:					54.30	48,870.00

Name of Paralegals and Other Non-Legal Staff	Standard Hourly Billing Rate (\$)	Capped Hourly Rate in this Case (\$)	Total Billed Hours	Total Compensation at Capped Rate (\$)
Beth D. Dassa	545.00	400.00	0.80	320.00
Yves P. Derac	545.00	400.00	3.10	1,240.00
Total Paralegals:			3.90	1,560.00

ALL PROFESSIONALS	DISCOUNTED/CAPPED BLENDED RATE (\$)	TOTAL BILLED HOURS	TOTAL COMPENSATION (\$)
Attorneys	900.00	54.30	48,870.00
Paralegals, Non-Legal Staff	400.00	3.90	1,560.00
Total Hours and Fees Incurred		58.20	50,430.00

EXHIBIT B

Compensation by Task Code

**AGGREGATE TIME SUMMARY BY TASK CODE
FOR THE PERIOD APRIL 1, 2023 – APRIL 30, 2023**

Task Code	Project Category	Total Hours	Total Fees (\$)
AD	Asset Disposition	1.10	1,337.50
CA	Case Administration	0.30	206.50
CO	Claims Admin/Objections	2.70	3,394.50
CP	Compensation of Professionals	3.80	2,468.00
CPO	Compensation of Professionals/Others	0.90	877.50
GC	General Creditors Committee	4.50	5,827.00
H	Hearings	1.30	1,495.00
PD	Plan & Disclosure Statement	43.50	50,643.00
	TOTAL	58.20	\$66,346.50 less discount of \$15,916.50, for a total of \$50,430.00

EXHIBIT C

Expense Summary

**AGGREGATE ITEMIZED EXPENSES FOR THE PERIOD
APRIL 1, 2023– APRIL 30, 2023**

Expenses Category	Total Expenses (\$)
Federal Express	51.14
Outside Services	500.00
Pacer – Court Research	13.80
Postage	8.34
TOTAL	\$573.28

EXHIBIT D

Itemized Time Detail for the Fee Period

Pachulski Stang Ziehl & Jones LLP

10100 Santa Monica Blvd.
13th Floor
Los Angeles, CA 90067

May 31, 2023

Invoice 132643

Client 54162

Matter 00004

GNB

Madison Square Boys & Girls Club, Inc.

RE: Committee Representaton

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 05/31/2023

FEES	\$66,346.50
EXPENSES	\$573.28
LESS COURTESY DISCOUNT	\$15,916.50
TOTAL CURRENT CHARGES	\$51,003.28
BALANCE FORWARD	\$345,624.43
TOTAL BALANCE DUE	\$396,627.71

Pachulski Stang Ziehl & Jones LLP
Madison Square BGC O.C.C.
54162 -00004

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Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
BDD	Dassa, Beth D.	Paralegal	545.00	0.80	\$436.00
GNB	Brown, Gillian N.	Counsel	975.00	3.60	\$3,510.00
JIS	Stang, James I.	Partner	1695.00	2.10	\$3,559.50
JWL	Lucas, John W.	Partner	1150.00	39.90	\$45,885.00
MSP	Pagay, Malhar S.	Partner	1295.00	8.70	\$11,266.50
YPD	Derac, Yves Pierre	Paralegal	545.00	3.10	\$1,689.50
				<hr/> 58.20	<hr/> \$66,346.50

Pachulski Stang Ziehl & Jones LLP
Madison Square BGC O.C.C.
54162 -00004

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May 31, 2023

Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AD	Asset Disposition [B130]	1.10	\$1,337.50
CA	Case Administration [B110]	0.30	\$206.50
CO	Claims Admin/Objections[B310]	2.70	\$3,394.50
CP	Compensation Prof. [B160]	3.80	\$2,468.00
CPO	Comp. of Prof./Others	0.90	\$877.50
GC	General Creditors Comm. [B150]	4.50	\$5,827.00
H	Hearings	1.30	\$1,495.00
PD	Plan & Disclosure Stmt. [B320]	43.50	\$50,643.00
RPO	Ret. of Prof./Other	0.10	\$97.50
		58.20	<hr/> \$66,346.50

Pachulski Stang Ziehl & Jones LLP
Madison Square BGC O.C.C.
54162 -00004

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May 31, 2023

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Federal Express [E108]	\$51.14
Outside Services	\$500.00
Pacer - Court Research	\$13.80
Postage [E108]	\$8.34
	<hr/>
	\$573.28

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Asset Disposition [B130]						
05/17/2023	JWL	AD	Review Navy Yard sale summary and send to committee for review.	0.60	1150.00	\$690.00
05/18/2023	MSP	AD	Email exchange with J. Weber, J. Lucas, S. Landgraber, et al. re: Navy Yard sale process.	0.30	1295.00	\$388.50
05/19/2023	MSP	AD	Telephone call with J. Lucas regarding Navy Yard property.	0.20	1295.00	\$259.00
				1.10		\$1,337.50
Case Administration [B110]						
05/10/2023	GNB	CA	Review Debtor's ninth interim cash management motion; Email Jordan Merson and Matt Merson regarding publication of survivor name on docket; Email with Shafaq Hasan and Leslie Lieberman regarding returned service to Debtor via USPS.	0.10	975.00	\$97.50
05/10/2023	BDD	CA	Review Notice of Presentment of 9th Interim Order Authorizing Debtor to Operate Cash Management system (.10) and emails G. Brown, N. Brown, and B. Anavim re same (.10).	0.20	545.00	\$109.00
				0.30		\$206.50
Claims Admin/Objections[B310]						
05/03/2023	JIS	CO	Call J. Lucas regarding status of Madison issues with Rockefeller U. claims.	0.20	1695.00	\$339.00
05/08/2023	MSP	CO	Email exchange with J. Weber, J. Lucas, et al. regarding Summit request for administrative expense.	0.10	1295.00	\$129.50
05/10/2023	MSP	CO	Legal research regarding New York tortfeasor law (1.3); email exchange with J. Lucas, J. Weber, et al. regarding same (.40).	1.70	1295.00	\$2,201.50
05/11/2023	MSP	CO	Email exchange with L. Liberman, et al. regarding resolution of Rockefeller claim.	0.10	1295.00	\$129.50
05/12/2023	GNB	CO	Email John W. Lucas regarding next week's hearing on objection to Rockefeller's claim.	0.10	975.00	\$97.50
05/12/2023	MSP	CO	Email exchange with L. Liberman, et al. regarding Rockefeller claim stipulation.	0.10	1295.00	\$129.50
05/15/2023	MSP	CO	Email exchange with J. Lucas, J. Weber, R. Chiu, et	0.20	1295.00	\$259.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			al. regarding Summit administrative expense.			
05/24/2023	BDD	CO	Review Debtor's produced docs relating to Rockefeller(.10); email G. Brown re same (.10).	0.20	545.00	\$109.00
				2.70		\$3,394.50

Compensation Prof. [B160]

05/04/2023	MSP	CP	Email exchange with J. Weber, A. Schwartz, et al. regarding Second Interim Fee Applications.	0.10	1295.00	\$129.50
05/15/2023	MSP	CP	Email exchange with J. Lucas, G. Brown, T. Tiantian, J. Weber, et al. regarding Second Interim Fee Applications.	0.20	1295.00	\$259.00
05/17/2023	GNB	CP	Email John W. Lucas regarding preparation for tomorrow's fee application hearing.	0.10	975.00	\$97.50
05/17/2023	YPD	CP	Preparation of draft of 10th PSZJ Monthly Fee Statement (April 2023) and revision to same.	0.40	545.00	\$218.00
05/17/2023	YPD	CP	Analysis of email from B. Dassa and review of attachments re April 2023 Fee Statements (.3); and preparation of April 2023 Fee Statements Exhibits thereon (.3).	1.60	545.00	\$872.00
05/18/2023	GNB	CP	Email with John W. Lucas regarding PSZJ fee application holdback; Email with Shafaq Hasan regarding same; Email Matthew Dundon regarding fee application hearing.	0.10	975.00	\$97.50
05/18/2023	GNB	CP	Review PSZJ's April 2023 monthly fee statement.	0.10	975.00	\$97.50
05/18/2023	GNB	CP	Draft my certificate of non objection to PSZJ's March 2023 monthly fee statement.	0.10	975.00	\$97.50
05/18/2023	YPD	CP	Analysis of email from G. Brown re 10th Fee Statement and finalizing of same for filing on 5/19/2023; respond to email on same	0.10	545.00	\$54.50
05/18/2023	YPD	CP	Revision to PSZJ April 2023 Monthly Fee Statement and Exhibits.	0.40	545.00	\$218.00
05/18/2023	YPD	CP	Analysis of email and attachments from B. Dassa re Fee Statement and respond to email thereto (.1); email to G. Brown on same for approval (.1).	0.20	545.00	\$109.00
05/19/2023	YPD	CP	Analysis of emails from G. Brown re Fee Statement and further modifications, filing and service thereof and respond to email thereto (.3); review of attachment of CNO for statement (.1).	0.40	545.00	\$218.00

				3.80		\$2,468.00
Comp. of Prof./Others						
05/11/2023	GNB	CPO	Email with Tabish Rizvi regarding Dundon fee application; Email with Steven Landgraber regarding Island Capital fee application.	0.10	975.00	\$97.50
05/15/2023	GNB	CPO	Emails with John W. Lucas, with John Weber, and with Shafaq Hasan regarding May 18 fee application hearing (.1); Review proposed orders from Paul Weiss thereon (.2).	0.30	975.00	\$292.50
05/15/2023	GNB	CPO	Email with Tara Tiantian regarding Island Capital and Dundon Advisers fee application issues; Email Island Capital and Dundon Advisers regarding same.	0.10	975.00	\$97.50
05/15/2023	GNB	CPO	Telephone conference with Steven Landgraber regarding fee application hearing on May 18.	0.10	975.00	\$97.50
05/16/2023	GNB	CPO	Telephone conference with Shafaq Hasan regarding UST communications with Island Capital and Dundon Advisers; Email with Shafaq Hasan regarding same.	0.10	975.00	\$97.50
05/16/2023	GNB	CPO	Email with Tara Tiantian regarding Island Capital and Dundon Advisers' fee applications: Email Robert Lieber and Steven Landgraber regarding same.	0.10	975.00	\$97.50
05/16/2023	GNB	CPO	Email with Matthew Dundon, Tabish Rizvi, and Michael Whalen regarding Tara Tiantian's email regarding Dundon Advisers' fee application.	0.10	975.00	\$97.50
				0.90		\$877.50
General Creditors Comm. [B150]						
05/01/2023	MSP	GC	Email exchange with J. Lucas, et al. re; Committee meeting.	0.10	1295.00	\$129.50
05/24/2023	GNB	GC	Attend Committee call regarding open plan-related issues.	1.30	975.00	\$1,267.50
05/24/2023	GNB	GC	Edit minutes of today's Committee call.	0.10	975.00	\$97.50
05/24/2023	JIS	GC	Attend committee call re sale of property and plan issues.	1.30	1695.00	\$2,203.50
05/24/2023	JWL	GC	Review and revise committee meeting minutes.	0.50	1150.00	\$575.00
05/30/2023	MSP	GC	Attend Committee meeting.	1.20	1295.00	\$1,554.00
				4.50		\$5,827.00

Hearings

05/18/2023	JWL	H	Prepare for second interim fee hearing (.5); attend second interim fee hearing (including prehearing time) (.8);	1.30	1150.00	\$1,495.00
				1.30		\$1,495.00

Plan & Disclosure Stmt. [B320]

05/01/2023	MSP	PD	Email exchange with J. Lucas, J. Weber, et al. regarding Plan solicitation.	0.10	1295.00	\$129.50
05/01/2023	BDD	PD	Review Notice re Plan & Disclosure Statement (.10) and emails G. Brown and B. Anavim re same (.20).	0.30	545.00	\$163.50
05/01/2023	BDD	PD	Email G. Brown re Notice of Combined Hearing on Ch. 11 Plan & Final Approval of Disclosure Statement.	0.10	545.00	\$54.50
05/01/2023	JWL	PD	Respond to solicitation questions from counsel to committee members (.5);	0.50	1150.00	\$575.00
05/02/2023	MSP	PD	Telephone call with J. Lucas regarding Plan status.	0.20	1295.00	\$259.00
05/02/2023	MSP	PD	Email exchange with J. Lucas, J. Weber, et al. regarding Rockefeller stipulation, Plan supplement, etc.	0.20	1295.00	\$259.00
05/02/2023	JWL	PD	Review and comment on compensation note (.5); review and comment on plan supplement (1.0); review Rockefeller claim stipulation regarding voting and expungement and send summary to committee (.5);	2.00	1150.00	\$2,300.00
05/03/2023	JIS	PD	Call J. Lucas regarding Madison confirmation issues.	0.20	1695.00	\$339.00
05/03/2023	MSP	PD	Telephone call with J. Lucas regarding Plan status.	0.10	1295.00	\$129.50
05/03/2023	MSP	PD	Email exchange with J. Lucas, B. Hart, D. Ellis, et al. regarding Rockefeller issues.	0.10	1295.00	\$129.50
05/03/2023	JWL	PD	Call with S. Gershowitz and J. Freeman regarding Rockefeller issues under the plan (1.0); review proposed Rockefeller release re plan (.9); call with J. Stang regarding Rockefeller plan issues (.2);	2.10	1150.00	\$2,415.00
05/04/2023	MSP	PD	Email exchange with S. Gershowitz, G. Brown, et al. regarding Rockefeller discussion.	0.10	1295.00	\$129.50
05/04/2023	JWL	PD	Call with S. Gershowitz regarding plan and Rockefeller (.5); call with state court counsel regarding plan and Rockefeller (1.4); call with J.	2.30	1150.00	\$2,645.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			Weber regarding same (.4);			
05/05/2023	MSP	PD	Email exchange with L. Liberman, J. Lucas, et al. regarding case law relevant to potential Plan resolution (.10) and begin review of same (.40).	0.50	1295.00	\$647.50
05/08/2023	MSP	PD	Telephone calls (2: .20; .20) with J. Lucas regarding Plan status.	0.40	1295.00	\$518.00
05/08/2023	MSP	PD	Catch-up meeting with J. Lucas and debtor's counsel regarding Plan status.	0.50	1295.00	\$647.50
05/08/2023	JWL	PD	Review Rockefeller discovery protective order and respond to Paul Weiss re same (.5); review New York case law regarding contribution and limits thereto (2.0); call with J. Weber and M. Pagay regarding open plan issues (.5);	3.00	1150.00	\$3,450.00
05/10/2023	GNB	PD	Email with Shafaq Hasan and Lauren Varga regarding Debtor document production in response to Rockefeller request; Email Beth D. Dassa regarding same.	0.10	975.00	\$97.50
05/10/2023	MSP	PD	Telephone calls (2: .30; .20) with J. Lucas regarding Rockefeller issues.	0.50	1295.00	\$647.50
05/10/2023	JWL	PD	Call with J. Weber regarding plan and Rockefeller issues (.3); review supplemental disclosure notice (.5); review plan regarding distributions under trust (.5); review applicable New York law regarding settling co-tortfeasors (1.4);	2.70	1150.00	\$3,105.00
05/11/2023	MSP	PD	Telephone call with J. Lucas regarding Plan status.	0.10	1295.00	\$129.50
05/11/2023	MSP	PD	Email exchange with J. Lucas, I. Nasatir, L. Leder, S. Gershowitz, J. Weber, S. Kjontvedt, et al. regarding Resolution of Plan issues, voting, etc.	0.50	1295.00	\$647.50
05/11/2023	JWL	PD	Call with A. Levine and S. Gershowitz re plan and Rockefeller issues (1.0); call with J. Weber regarding Rockefeller issues and balloting (.3); emails with counsel to committee members regarding receipt of and missing ballots (.5);	1.80	1150.00	\$2,070.00
05/12/2023	MSP	PD	Email exchange with S. Kjontvedt, J. Freeman, B. Hart, et al. regarding voting issues.	0.20	1295.00	\$259.00
05/12/2023	JWL	PD	Emails with Marsh, Eisenhoffer, and Levy law firms regarding new ballots and questions regarding solicitation (1.2); emails with Epiq re same (.3);	1.50	1150.00	\$1,725.00
05/15/2023	GNB	PD	Review documents produced by Debtor to Data Site with regard to Navy Yard.	0.30	975.00	\$292.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/15/2023	JIS	PD	Call J. Lucas regarding plan issues, including Rockefeller negotiations.	0.40	1695.00	\$678.00
05/15/2023	MSP	PD	Email exchange with L. Liberman, et al. regarding Disclosure Statement supplement.	0.10	1295.00	\$129.50
05/15/2023	JWL	PD	Call with J. Weber regarding open plan issues (.4);	0.40	1150.00	\$460.00
05/16/2023	GNB	PD	Email with Lauren Varga regarding Navy Yard-related documentation in Empire DataSite; Email Sophia L. Lee regarding retrieval of same.	0.10	975.00	\$97.50
05/16/2023	JWL	PD	Email to counsel to committee members regarding Rockefeller contribution claim issue and plan distributions (1.5); email with J. Scotto regarding solicitation issues (.2); email with Levy Konigsberg counsel regarding solicitation and ballots (.6);	2.30	1150.00	\$2,645.00
05/18/2023	JWL	PD	Review solicitation procedures order and Bankruptcy Rules in response to question from committee re voting issues (.6); email to committee re same (.6);	1.20	1150.00	\$1,380.00
05/19/2023	JWL	PD	Prepare for (.2) and attend call with Paul Weiss, S. Landgraber, and Cushman Wakefield regarding sale of Navy Yard (.5); follow up call with S. Landgraber re same (.2); call with A. Raphael regarding plan and Rockefeller issues (.5) and review release re same (.3); email with J. Freeman regarding solicitation issues (.2); review revised plan and allocation protocol (.8); call with J. Weber re same (.3); draft summary of Navy Yard issues for committee (.4); draft summary of proposed plan changes for committee (.9);	4.30	1150.00	\$4,945.00
05/24/2023	JWL	PD	Call with committee and counsel regarding Navy Yard, Rockefeller plan impact, and voting (1.3); email to Madison counsel regarding Rockefeller treatment (.4);	1.70	1150.00	\$1,955.00
05/25/2023	GNB	PD	Communications with John W. Lucas regarding ballots.	0.10	975.00	\$97.50
05/25/2023	MSP	PD	Telephone call with J. Lucas regarding Plan status.	0.20	1295.00	\$259.00
05/25/2023	MSP	PD	Meeting with debtor's counsel regarding status update.	0.60	1295.00	\$777.00
05/25/2023	JWL	PD	Call with S. Gershowitz re plan issues and voting (.5); call with J. Stang re Gershowitz and plan issues (.2); call with S. Gershowitz and Survivor client re plan and voting (1.0); call with J. Weber and PW	7.30	1150.00	\$8,395.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			team, M. Pagay re plan and voting issues (.6); call with G. Novod regarding plan and voting (.5); call with A. Raphael regarding plan and voting issues (.6); call with L. Leder regarding plan and voting issues (.5); call with J. Amala regarding plan and voting issues (.7); call with J. Stang regarding plan and voting issues (.3); call with J. Merson regarding plan and voting issues (.4); review voting summary (.3); email with J. Weber and L. Lieberman regarding voting issues (.2); call with R. Liguori re plan and voting issues (.5); draft email to committee regarding pending voting and plan confirmation issues (1.0);			
05/26/2023	JWL	PD	Call with J. Weber re voting issues (.3); call with D. Ellis re voting issues (.3); review revised plan supplement prior to filing (1.0); emails with R. Liguori regarding plan voting issues (.3):	1.90	1150.00	\$2,185.00
05/30/2023	JWL	PD	Emails with committee re meeting over voting issues and Navy Yard update (.2); prepare for committee call re voting (.5); call with committee re voting (1.3);	2.00	1150.00	\$2,300.00
05/31/2023	JWL	PD	Emails with Committee re voting issues under the plan (.5);	0.50	1150.00	\$575.00
				43.50		\$50,643.00
Ret. of Prof./Other						
05/26/2023	GNB	RPO	Review Debtor's motion to retain Portage Point; Email PSZJ team regarding same.	0.10	975.00	\$97.50
				0.10		\$97.50
TOTAL SERVICES FOR THIS MATTER:						\$66,346.50

Expenses

05/11/2023	PO	LA Postage	2.94
05/19/2023	FE	54162.00004 FedEx Charges for 05-19-23	25.57
05/19/2023	FE	54162.00004 FedEx Charges for 05-19-23	25.57
05/19/2023	PO	LA Postage	5.40
05/31/2023	OS	Everlaw, Inv.#83132	500.00
05/31/2023	PAC	Pacer - Court Research	13.80

Total Expenses for this Matter

\$573.28

REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 05/31/2023

Total Fees \$66,346.50

Total Expenses 573.28

Less Courtesy Discount \$15,916.50

Total Due on Current Invoice \$51,003.28

Outstanding Balance from prior invoices as of 05/31/2023 (May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
130635	07/31/2022	\$127,920.00	\$291.19	\$12,792.00
130861	08/31/2022	\$198,760.00	\$4,027.47	\$19,876.00
131167	09/30/2022	\$134,060.00	\$1,599.53	\$13,406.00
131231	10/31/2022	\$173,320.00	\$3,451.38	\$17,048.00
131456	11/30/2022	\$124,590.00	\$4,111.19	\$12,459.00
131587	12/31/2022	\$94,200.00	\$742.39	\$9,420.00
131796	01/31/2023	\$57,540.00	\$654.69	\$5,754.00
131996	02/28/2023	\$89,980.00	\$778.31	\$8,998.00
132246	03/31/2023	\$178,180.00	\$231.50	\$178,411.50
132389	04/30/2023	\$66,150.00	\$1,309.93	\$67,459.93

Total Amount Due on Current and Prior Invoices: \$396,627.71